

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MELISSA LOWRY, ADAM ALZALDI,
DWIGHT CHORNOMUD, MELISSA
CUEVAS, PAMELA GIARRIZZO, CAROLE
GRANT, CYNTHIA MEUSE, and LATRONYA
WILLIAMS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

PROCTER & GAMBLE COMPANY,

Defendant.

No. 2:25-cv-00108-JHC

**STIPULATED MOTION AND ORDER
EXTENDING TIME TO FILE (1)
AMENDED COMPLAINT AND (2)
RULE 26(f) JOINT STATUS REPORT
AND DISCOVERY PLAN AND (3)
SETTING BRIEFING SCHEDULE**

NOTE ON MOTION CALENDAR:
April 4, 2025

STIPULATION

The parties, by and through their counsel, have agreed and stipulate as follows:

1. On February 14, 2025, the Court entered the parties' stipulation extending the time for Defendant to respond to Plaintiffs' complaint and setting a briefing schedule for a motion to dismiss. Dkt. 11. Pursuant to that stipulated schedule, Defendant filed its motion to dismiss on March 20, 2025. Dkt. 16.

2. On February 28, 2025, the Court set deadlines for the Rule 26(f) conference, initial disclosures, and an April 4, 2025 deadline for the parties to file their Rule 26(f) Joint Status Report and Discovery Plan ("Rule 26(f) Report"). Dkt. 15.

3. The parties conducted a Rule 26(f) conference on March 14, 2025, and were cooperatively preparing their joint Rule 26(f) Report for filing on April 4, 2025. During this process Plaintiffs informed Defendant of their recent decision to file an amended complaint pursuant to Rule 15(a)(1). Without an extension, the deadline for the amended complaint is April 10, 2025.

4. The parties then promptly met and conferred and have jointly agreed to extend the time for Plaintiffs to file their amended complaint from April 10, 2025, to April 25, 2025. The parties agree that this amendment constitutes Plaintiffs' amendment as a matter of course under Rule 15(a)(1) and that any future amendments will be governed under Rule 15(a)(2).

5. The parties also agreed to extend the deadline to answer or otherwise respond to Plaintiffs' amended complaint to June 5, 2025.

6. In the event Defendant files a motion to dismiss, the parties have agreed to a briefing schedule on that motion as follows:

Motion to Dismiss Due: June 5, 2025

Opposition Due: July 16, 2025

Reply Due: August 6, 2025

The noting date for any motion to dismiss will be August 6, 2025.

7. Given the upcoming amendment, the parties also agreed to extend the deadline for filing their Rule 26(f) Report from April 4, 2025, to May 9, 2025. These modest extensions will afford Plaintiffs additional time to file their amended complaint and afford the parties time after amendment to prepare a most robust Rule 26(f) Report for the Court's consideration..

SO STIPULATED this 4th day of April 2025.

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ORDER

Pursuant to the parties' above stipulation, the deadline for Plaintiffs to file their amended complaint is extended to April 25, 2025; the deadline for Defendant to file its response to or motion to dismiss the amended complaint is extended to June 5, 2025; the deadline for Plaintiffs to file their opposition to any motion to dismiss is extended to July 16, 2025; the deadline for Defendant to file its reply in support of any motion to dismiss is extended to August 6, 2025; and the deadline for the parties to file their Rule 26(f) Report is extended to May 9, 2025.

IT IS SO ORDERED this 4th day of April 2025.



John H. Chun

UNITED STATES DISTRICT JUDGE